

In Ameritech's January 10, 1997, Statement this modification was made in the Statement, but not the associated tariff. The Commission determined the modification must be made to the tariffs. In its March 3, 1997 filing, Ameritech has incorporated this language in its tariffs.

7. *Ameritech is not allowed to revise its Statement to exempt from discount its promotions, discounts and non-standard offerings of greater than 90 days.*

No action is required because Ameritech does not have such an exemption in its tariff or Statement. Frontier commented that Ameritech's promotions of less than 90 days could cover services unavailable for resale at any price. The Commission does not believe that Ameritech's language allows that outcome, nor should it. Any service offered for promotion must also be available for resale at a wholesale discount from a tariffed retail price.

8. *Ameritech's offering must be revised to make clear all telecommunications services offered via individual contracts are to be available for resale at discounted prices.*

In Ameritech's January 10, 1997, Statement, Ameritech contended that the requirement of the order was a misreading of the federal law and the Commission should remove this requirement and address the issue in the "fresh look" portion of docket 05-TI-138. Staff's memo explained that "fresh look" is a separate and distinct issue of terminating the underlying contract and whether penalties for termination of contracts should be allowed. Under resale all the terms of the existing contract are still in effect including termination provisions. The contract itself is discounted to the extent retailing costs are avoided.

The Commission finds that avoided retailing costs for individual contract basis (ICB) services are essentially zero and that resale at the contract rate would be reasonable. However,

with the discount on ICBs stated as zero, the remaining overall discount rate on all remaining retail services should be increased to 19.4 percent from 18.6 percent. A discount of zero on ICB contracts would then meet the requirement that all telecommunications services that a carrier provides at retail to subscribers who are not telecommunications carriers are subject to resale and the discount must be based on avoided retailing costs.

Ameritech's March 3, 1997, Statement included an overall discount of 19.4 percent and included an appropriate tariff reference for resale of ICBs upon request at the contract rate with no discount.

9. *Ameritech's offering must be revised to state that notice of a new service will be provided to purchasers of resold services when each roll-out schedule for a new service has been set.*

In its January 10, 1997, Statement, Ameritech indicated in the Statement only that 60 days notice would be given of all new services. Comments were sought regarding whether the fixed 60-day time period provided the same protection as the Commission's previous "roll-out" requirement. Since no objections to the substitution were voiced in the comments, the Commission finds it is reasonable to substitute the 60-day time period for the "roll out" time period, and that this term should be included in tariffs as well as the Statement. Ameritech has incorporated this language in the tariffs supporting its March 3, 1997, Statement.

FINDINGS OF ULTIMATE FACT

THE COMMISSION FINDS:

1. It is just and reasonable for the Commission to find that the revisions and adjustments to the Statement summarized below are reasonable and necessary, as discussed in the preceding Findings of Fact. Requirements from the first order are shown in *italics*. New requirements, supported in this order, are shown in regular type. These revisions and adjustments are necessary for compliance with §§ 251 and 252(d), Wisconsin law, and this Commission's prior orders:

i. Local Carrier Interconnection

1. *All rates, terms, and conditions of interconnection must be included in tariffs.*

Ameritech's March 3, 1997, Statement complies with this requirement.

2. *Ameritech's offering must clearly state that indirect interconnection will be allowed.*

Ameritech's March 3, 1997, Statement complies with this requirement.

3. *Ameritech's offering must be revised to include the explanation that disputes regarding technical and operational matters will be referred to the Commission staff for review. Staff is allowed to refer such an issue to the Technical Forum for advice before issuing a determination or presenting the matter to the Commission. Staff determinations may be appealed to the Commission.*

Ameritech's March 3, 1997, Statement complies with this requirement.

4. *Ameritech's offering must state that two-way trunking will be available upon request for local interconnection.*

Ameritech's March 3, 1997, Statement complied with this requirement.

5. *No adjustment is required on this issue in the first order.*

6. *No adjustment is required on this issue in the first order.*

7. *Ameritech's offering must be revised to make the implementation team an option available at the request of interconnecting companies.*

Ameritech's March 3, 1997, Statement complies with this requirement.

ii. Nondiscriminatory Access to Unbundled Elements

1. *All terms and conditions of interconnection and unbundled elements must be included in tariffs.*

Ameritech's March 3, 1997, Statement complies with this requirement.

2. *All operations support systems and electronic interfaces must be tested and operational before they are acceptable for tariffing.*

Ameritech's March 3, 1997, Statement does not comply with this requirement.

(a) Appendix B to this order contains a list of information that Ameritech shall gather and submit to the Commission along with any refiling of its Statement for approval.

(b) It is reasonable to replace the original order requirement with the following requirement: Operations support systems must be tested and operational before a Statement will be approved. Those systems must be available on a nondiscriminatory basis.

(c) It is reasonable to require that the terms and conditions of Ameritech's OSS interfacing include a change management system as described in the Findings of Fact above.

3. *Performance benchmarks must be included in unbundled element offerings. Ameritech's offering must state that issues regarding type, standards, levels, and frequency of performance benchmarks may be referred to the Commission.*

Ameritech's January 10, 1997, and March 3, 1997, Statements comply only with the second part of this requirement. Not all unbundled element offerings have established benchmarks. Further development of benchmarks for the unbundled elements is needed and is being worked on. However, finality regarding all benchmarks may not be necessary for approval of the Statement

4. *Ameritech's offering must state the maximum time interval for provision of service. At the request of any interconnecting party, that time interval may be appealed to the Commission.*

Staff did not find a specific reference to maximum time intervals in Ameritech's January 10, 1997 or March 3, 1997, Statements. It may be considered included in the reference to performance benchmarks discussed above. The tariffs should include a general reference to the maximum time interval for provision of service, while the specific intervals need not be included in tariff language if they are otherwise given in the Statement.

5. *(a) Ameritech must revise its rates for unbundled elements to reflect the appropriate economic lives as set forth in the Final Order in docket 05-DT-101, dated September 15, 1995.*

Ameritech's March 3, 1997, Statement complies with this requirement.

It is reasonable to allow Ameritech to request revision of its rates for unbundled network elements to reflect a change in the range of depreciation rates authorized in future proceedings.

5. *(b) No adjustment is required on this issue in the first order.*

5. *(c) Ameritech must revise all its rates for unbundled elements to reflect joint and common costs based on 1997 total joint and common costs divided by 1997 total demands.*

Ameritech's March 3, 1997, Statement complies with this requirement.

6. *(a) Ameritech must remove the differential pricing of Zone A, Zone B, and Zone C and price all unbundled loops on a geographically uniform basis, unless Ameritech proposes an economically rational system of deaveraged prices, together with full technical, economic, and cost support.*

Ameritech's March 3, 1997, Statement complies with this requirement.

6. *(b) No adjustment is required on this issue in the first order.*

6. *(c) Ameritech must include in the price of a port only those features that appear on a typical port for the service line classification, including separate residence and business ports.*

Ameritech's March 3, 1997, Statement complies with this requirement except review of the cost basis for Ameritech's differential pricing of ports by features will be an issue in Ameritech's next filing of the Statement.

iii. Nondiscriminatory Access to Poles, Ducts, Conduits, and Rights-of-Way

1. *All terms and conditions related to rights-of-way must be included in interconnection tariffs.*

Ameritech's March 3, 1997, Statement complies with this requirement.

2. *Ameritech's offering must be revised to make it clear access will be provided to rights-of-way held by ownership of property as well as rights-of-way acquired from other property owners.*

Ameritech's March 3, 1997, Statement complies with this requirement.

3. *While Ameritech must provide "pathways" through its manholes, etc., to allow access to its rights-of-way, the existence of such pathways does not imply that interconnection in such "pathways" is automatically feasible.*

Ameritech's March 3, 1997, Statement does not comply with this requirement. Tariffs still need to be revised to include access through "pathways."

4. *Ameritech must revise its offering to state that if access is not granted within 45 days, then the utility will confirm the denial in writing including all relevant evidence and how such evidence or information relate to a denial in conformance with the Federal rules.*

Ameritech's March 3, 1997, Statement complied with this requirement.

5. *No adjustment is required on this issue in the first order.*

6. *No adjustment is required on this issue in the first order.*

7. *No adjustment is required on this issue in the first order.*

iv. Unbundled Local Loop Transmission

Addressed elsewhere.

v. Unbundled Local Transport and vi. Unbundled Local Switching

1. Dark fiber must be offered as an unbundled element.

Ameritech's offering of dark fiber is inadequate to meet this requirement. It must be revised to bolster the dependability and predictability of the offering. Further review of the pricing of dark fiber is also necessary.

2. All transport facilities must be offered on both a shared basis and a dedicated basis.

Ameritech's offerings of shared and dedicated transport are deficient. Unbundled dedicated transport has dedicated ports, customized routing, and is in sizes that allow a reasonable progression to more concentrated facilities without overbuilding. Shared transport uses Ameritech's routing tables and does not require engineering or dedicated ports. It is reasonable to apply an overflow charge when dedicated transport overflows onto common transport.

It is reasonable to require Ameritech to comply with all provisions of this order to gain approval of a statement before the FCC issues an order on reconsideration of the existing rules. If Ameritech files after the FCC changes its rules, it may file its Statement to comply with any revised FCC rules on shared transport.

Commissioner Mettner dissents with regard to option 2.

3. Customized routing functions must be offered without a bona fide request (BFR) process.

Ameritech's March 26, 1997, tariff filing complies with this requirement. Pricing is presumed appropriate at this time although further review may be necessary upon refiling of the Statement.

4. Vertical switch features, including those not currently offered by Ameritech, must be made generally available without a BFR process.

The Commission will accept Ameritech's March 26, 1997, tariff filing as meeting the intent of this requirement. Ameritech must provide lists of the features for each switch, the status of the feature, and available information on the applicable right-to-use fees. Pricing is presumed appropriate at this time although further review may be necessary upon refiling of the Statement.

5. Ameritech shall allow collocation of remote switching modules (RSMs) of a capacity suited to market entry. Reasonable limits on collocated RSM capacity will be allowed in the tariffs, where such limits will not constrain market entry, are supportable by space, power or CO environmental limitations, and allow a reasonable accommodation of market share growth.

6. Ameritech's position regarding application of access charges is discriminatory. The AT&T position that all access revenues accrue to the provider of the line card serving the end user, and the CompTel position, to the extent that it is similar, is rejected. Staff's proposal that Ameritech's prohibition against CLECs using an unbundled trunk-side port to provide access services for other than its own customer cannot be approved under current FCC rules. The Commission finds that access revenues for a portion of access services rightly accrue to the provider of that access portion, as described in the Findings of Fact. Ameritech shall not

collect access charges for any portion of a call if another provider is entitled to access revenues for that portion. Ameritech must provide sufficient call detail to allow providers to bill for access, and may charge for that detail, as described in the Findings of Fact.

7. Costs associated with usage development and implementation should be reflected in the associated unbundled rate elements and not reflected as a separate charge. Ameritech may refile the unbundled rates to reflect these costs.

Commissioner Eastman dissents.

vii. Nondiscriminatory Access to 9-1-1, Directory Assistance, and Operator Services

1. *Ameritech's terms, conditions, and/or charges must be adjusted so that new entrants' 9-1-1 service costs can be recovered in a manner not disadvantageous to new entrant companies.*

The Commission accepts the March 3, 1997, Statement and associated tariff as meeting the intent of this requirement.

viii. White Pages Listings

1. *No adjustment is required on this issue in the first order.*

2. *Ameritech must revise its offering to competitors to include availability of additional listings, customer services information pages, foreign directories, additional directories, and other services at a rate no more than cost plus a reasonable markup.*

This requirement is not necessary to ensure compliance with the 14-point competitive checklist of the Act. The Commission is limiting its consideration in the area of white pages listings to meeting the requirements of the 14-point competitive checklist of the Act and not

imposing a state requirement in this area of questionable state Commission authority.

Accordingly, the Commission eliminates this requirement.

Chairman Parrino dissents.

3. *Each Ameritech directory must include the listings for all competitors in exchanges for which it lists the incumbent's customers, including EAS and ECC customers, when listed.*

Ameritech's March 3, 1997, Statement complies with this requirement.

ix. Nondiscriminatory Access to Telephone Numbers

1. *No adjustment is required on this issue in the first order.*

x. Nondiscriminatory Access to Databases and Signaling for Call Routing

1. *Ameritech must state, in its tariffs, that denial of a bona fide request due to technical infeasibility may be referred to the Commission.*

Ameritech's March 3, 1997, Statement complies with this requirement.

2. *Ameritech must provide to its competitors the same level of assistance with LERG entries that it provides to small LECs.*

Ameritech's March 3, 1997, Statement complies with this requirement.

xi. Interim Number Portability

1. *No adjustment is required on this issue in the first order.*

2. *Ameritech's offering must be revised to state Ameritech will accumulate records of its long-run economic costs to be recovered when a cost recovery mechanism is developed.*

Ameritech's March 3, 1997, Statement complies with this requirement.

xii. Access to Services and Information to Implement Local Dialing Parity

1. *No adjustment is required on this issue in the first order.*

xiii. Reciprocal Compensation Arrangements

Addressed elsewhere.

xiv. Telecommunications Services Available for Resale.

1. *Ameritech must revise its resale rates using the best available data and using the costing methods and financial adjustments described in the Findings of Fact of the Commission's first order in this docket.*

Ameritech's March 3, 1997, Statement complies with this requirement.

2. *The discount must be applied uniformly to all services in a family unless an exception is granted. Exceptions must be supported by a showing that the ratio of LRSIC costs which are avoided to the total LRSIC costs for the service is significantly different than the average of LRSIC costs which are avoided to average total LRSIC costs for all services, or some verifiable systematic method to assure variations are reasonable*

Ameritech's March 3, 1997, Statement complies with this requirement. .

3. (a) *Ameritech shall modify its tariff to allow resellers to aggregate usage for the purpose of applying volume discounts. Residential volume usage discounts will be applied on a per end-user customer basis.*

Ameritech's March 3, 1997, Statement does not comply with this requirement. Further clarification of the tariff language covering usage aggregation for the purpose of application of volume discounts is necessary.

3. *(b) Ameritech must reduce the charges for all nonrecurring costs to no greater than cost plus a reasonable markup.*

Information supplied by Ameritech demonstrates that its nonrecurring charges bear a reasonable relationship to underlying costs. Therefore, Ameritech's March 3, 1997, Statement complies with this requirement.

4. *(a) All terms and conditions of resale must be included in tariffs, including operations system support and performance benchmarks.*

Ameritech's March 3, 1997, Statement complies with this requirement.

4. *(b) Ameritech's tariff must provide that copies of performance and parity reports will be provided to customers of unbundled and wholesale services as a condition of service, unless waived by the customer.*

Ameritech's March 3, 1997, Statement complies with this tariff requirement. The format and content of these reports is still not finalized, however, finalization may not be necessary for approval of the Statement.

The Commission adds one specific requirement regarding performance and parity reporting: To meet the needs of the parties to assess parity without disadvantaging Ameritech Communications Inc. (ACI), the report for ACI should be provided to each recipient of a report. For this report, competitively sensitive actual results may be converted to relative figures for comparison, such as percentages or another substitute appropriate for the performance measure shown. However the ACI information is shown, the report recipient should see its own results, those for Ameritech, and for all non-Ameritech customers, in the same substitute format in addition to the actual results format.

5. *Ameritech's offering must be revised to include discounted prices for resold grandparented and sunsetted services.*

Ameritech's March 3, 1997, Statement complies with this requirement.

6. *Ameritech's offering must be revised to allow unlimited transfers of grandparented and sunsetted services to new providers, so long as the customers remain otherwise eligible for the offering.*

Ameritech's March 3, 1997, Statement complies with this requirement.

7. *Ameritech is not allowed to revise its Statement to exempt from discount its promotions, discounts and non-standard offerings of greater than 90 days.*

No action is required. However, any service offered for promotion must also be available for resale at a wholesale discount from a tariffed retail price.

8. *Ameritech's offering must be revised to make clear all telecommunications services offered via individual contracts are to be available for resale at discounted prices.*

Ameritech's March 3, 1997, Statement complies with this requirement.

9. *Ameritech's offering must be revised to state that notice of a new service will be provided to purchasers of resold services when each roll-out schedule for a new service has been set.*

In its initial filing, Ameritech had proposed that competitors get notice of new services when the tariffs for those new services are filed. Parties objected, arguing that they should have the same amount of time to prepare marketing strategies for new services that Ameritech marketing people had. The Commission staff proposed that Ameritech notify competitors at the

same time it set a roll-out schedule. Ameritech countered with a proposal to provide a 60-day notification. The competitors were given opportunity to object to the 60-day proposal, and none did. Therefore, the Commission finds the 60-day notification period reasonable and Ameritech's March 3, 1997, Statement in compliance.

General

2. It is reasonable to require Ameritech to submit along with a future refiling of the Statement, information satisfying all the requirements listed in Appendix B.

3. Tariffs submitted for the purpose of compliance with orders in this docket have been placed on file although not all tariffs are found in compliance for approval of a Statement. Required tariff revisions are given in the preceding Findings of Fact. It is reasonable to require Ameritech to submit to the Commission its proposed tariff revisions no less than 14 days from the effective date of this order. Any significant revisions to these tariffs filed subsequent to a refiling of the Statement, but prior to its approval, will be treated as a new application for approval of a statement for purposes of the 60-day federal timeline for review.

CONCLUSION OF LAW

THE COMMISSION CONCLUDES:

It has jurisdiction under ss. 133.01, 133.07(2), 196.01, 196.02, 196.03, 196.04, 196.06, 196.07, 196.08, 196.19, 196.195, 196.20, 196.203, 196.204, 196.219, 196.22, 196.25, 196.26, 196.28, 196.37, 196.39, 196.395, 196.40, 196.499, 196.50, 196.58, 196.60(1), 196.65, Wis. Stats., other provisions of chs. 196 and 227, Wis. Stats., that may be pertinent thereto, and under authority granted the Commission under §§ 252 and 271 of the Act, and other provisions of the

Act that may be pertinent hereto, to make findings of fact as discussed above, to interpret statutes, to specify information to be supplied with the next Statement, to require prompt modification of the tariffs, and to accept, reject, refrain from acting upon and/or make modification to the Statement submitted by Ameritech for approval by this Commission.


ORDER

THE COMMISSION ORDERS:

1. This order is effective on issuance.
2. Ameritech's Statement is rejected.
3. Along with any future filing requesting approval of the Statement, Ameritech must submit to the Commission all of the items listed in Appendix B.
4. Those tariffs identified in the preceding Findings of Ultimate Fact must be submitted for revision no less than 14 days from the effective date of this order.
5. The Commission retains jurisdiction.

Dated at Madison, Wisconsin, May 29, 1997

By the Commission:



Lynda L. Dorr
Secretary to the Commission

LLD:JJR:lep:g:\order\digorder\pending\6720ti1202nd

See attached Notice of Appeal Rights

Notice of Appeal Rights

Notice is hereby given that a person aggrieved by the foregoing decision has the right to file a petition for judicial review as provided in s. 227.53, Stats. The petition must be filed within 30 days after the date of mailing of this decision. That date is shown on the first page. If there is no date on the first page, the date of mailing is shown immediately above the signature line. The Public Service Commission of Wisconsin must be named as respondent in the petition for judicial review.

Notice is further given that, if the foregoing decision is an order following a proceeding which is a contested case as defined in s. 227.01(3), Stats., a person aggrieved by the order has the further right to file one petition for rehearing as provided in s. 227.49, Stats. The petition must be filed within 20 days of the date of mailing of this decision.

If this decision is an order after rehearing, a person aggrieved who wishes to appeal must seek judicial review rather than rehearing. A second petition for rehearing is not an option.

This general notice is for the purpose of ensuring compliance with s. 227.48(2), Stats., and does not constitute a conclusion or admission that any particular party or person is necessarily aggrieved or that any particular decision or order is final or judicially reviewable.

Revised 4/22/91

APPENDIX A

This proceeding is not a contested case under Chapter 227, Stats., therefore there are no parties to be listed or certified under s. 227.47, Stats. However, a discretionary hearing was held, and the persons listed below participated.

Public Service Commission of Wisconsin
(Not a party but must be served)
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

WISCONSIN BELL, INC.
(d/b/a AMERITECH WISCONSIN)
by
Mr. Michael I. Paulson, Attorney
722 North Broadway
Milwaukee, WI 53202
(PH: 414-678-2127 / FAX: 414-678-2444)

AT&T COMMUNICATIONS OF WISCONSIN, INC.
by
Ms. Phyllis Dubé
44 East Mifflin Street, Suite 600
Madison, WI 53703-2877
(PH: 608-259-2213 / FAX: 608-259-2201)

FRONTIER COMMUNICATIONS OF THE GREAT LAKES, INC.
by
Mr. David Gilbert, Attorney
5329 N. Lakewood
Chicago, IL 60640
(PH: 773-878-9259 / FAX: 773-506-2492)

MCLEOD TELEMAGEMENT, INC.
by
Mr. William A. Haas, Attorney
221 Third Avenue, S.E.
Cedar Rapids, IA 52401
(PH: 319-298-7000 / FAX: 319-298-7008)

GTE NORTH INCORPORATED

by

Mr. David E. Hightower, Attorney
100 Communications Drive
P.O. Box 49
Sun Prairie, WI 53590
(PH: 309-663-3622 (IL) / FAX: 309-663-3647 (IL))

TELEPORT COMMUNICATIONS GROUP (TCG)

by

Mr. Michael G. Stuart
Ms. Rhonda R. Johnson
Boardman, Suhr, Curry & Field
One South Pinckney Street, Suite 410
P.O. Box 927
Madison, WI 53701-0927
(PH: 608-283-1728 / FAX: 608-283-1709)

WISCONSIN STATE TELEPHONE ASSOCIATION

by

Ms. Laurie Gosewehr
6602 Normandy Lane
Madison, WI 53719
(PH: 608-833-8866 / FAX: 608-833-2676)

WISCONSIN DEPARTMENT OF ADMINISTRATION

by

Mr. Paul Nelson
101 E. Wilson Street, 8th Floor
P.O. Box 7844
Madison, WI 53707-7844
(PH: 608-266-5667 / FAX: 608-266-2164)

**STATE OF WISCONSIN
DEPARTMENT OF JUSTICE**

by

Mr. Edwin J. Hughes
Assistant Attorney General
123 West Washington Avenue
P.O. Box 7856
Madison, WI 53707-7856
(PH: 608-264-9487 / FAX: 608-267-2778)

WISCONSIN CABLE COMMUNICATIONS ASSOCIATION

by

Mr. Tom Moore
2 East Mifflin Street, Suite 400
Madison, WI 53703
(PH: 608-256-1683 / FAX: 608-256-6222)

MCI TELECOMMUNICATIONS CORPORATION

by

Mr. Matthew H. Berns
205 N. Michigan Avenue, Suite 3700
Chicago, IL 60601
(PH: 312-470-3380 / FAX: 312-470-4929)

INTERSTATE TELCOM CONSULTING, INC.

by

Mr. Bruce C. Reuber, President
130 Birch Avenue West
Hector, MN 55342-0668
(PH: 320-848-6641 / FAX: 320-848-2466)

TIME WARNER COMMUNICATIONS

by

Mr. Peter L. Gardon, Attorney
Reinhart, Boerner, Van Deuren,
Norris & Rieselbach, S.C.
7617 Mineral Point Road, P.O. Box 2020
Madison, WI 53701-2020
(PH: 608-829-3434 / FAX: 608-829-0137)

RECYCLE WORLDS CONSULTING CORPORATION

by

Mr. Peter Anderson, President
4513 Vernon Blvd., Suite 15
Madison, WI 53705-4964
(PH: 608-231-1100 / FAX: 608-233-0011)

MR. GRANT B. SPELLMEYER, ATTORNEY

Axley Brynson
2 East Mifflin Street
P.O. Box 1767
Madison, WI 53701-1767
(PH: 608-257-5661 / FAX: 608-257-5444)

US XCHANGE

by

Ms. Mary C. Albert, Attorney
Mr. Kemal Hawa, Attorney
Swidler & Berlin, Chtd.
3000 K Street, N.W., Suite 300
Washington, DC 20007
(PH: 202-424-7500 / FAX: 202-424-7643)

SPRINT COMMUNICATIONS COMPANY, L.P.

by

Ms. Julie Thomas Bowles, Senior Attorney
State Regulatory Affairs
8140 Ward Parkway, 5E
Kansas City, MO 64114
(PH: 913-624-6420 / FAX: 913-624-5681)

Courtesy Copies:

Mr. Tony Tomaselli, Attorney
Quarles & Brady /Firststar Plaza
P.O. Box 2113
Madison, WI 53701-2113
(PH: 608-251-5000 / FAX: 608-251-9166)

Ms. Darcy Graham
Frontier Communications
180 South Clinton Avenue
Rochester, NY 14646
(PH: 716-777-1025 / FAX: 716-325-3096)

Mr. Doug Trabaris
Ms. Madelon Kuchera & Ms. Liz Howland
Teleport Communications Group
233 South Wacker Drive, #2100
Chicago, IL 60606
(PH: 312-705-9829 / FAX: 312-705-9890)

Mr. Niles Berman, Attorney
Wheeler, Van Sickle and Anderson, S.C.
25 West Main Street, Suite 801
Madison, WI 53703-3398
(PH: 608-255-7277 / FAX: 608-255-6006)

Ms. Marsha Rockey Schermer /VP, Regulatory
Midwest Region
1266 Dublin Road
Columbus, OH 43215
(PH: 614-481-5304 / FAX: 614-481-5006)

Mr. John T. Blount/General Manager
Time Warner Communications
1610 North Second Street
Milwaukee, WI 53212
(PH: 414-277-4112 / FAX: 414-277-4283)

Ms. Katherine E. Brown, Attorney
U.S. Dept of Justice /Antitrust Div
555 4th Street, N.W.
Washington, DC 20001
(PH: 202-514-5809 / FAX: 202-514-6381)

Mr. Jeff Frost
Americom
2236 Bluemound Road, Suites B & C
Waukesha, WI 53186
(PH: 414-798-9500, Ext. 11 / FAX: 414-798-1680)

Terry Monroe
Competitive Telecommunications Assn.
1900 Connecticut Ave., N.W., Ste. 800
Washington, D.C. 20036
(PH: 202-296-6650 / FAX: 202-296-7585)

Mr. Tim Gardella
WorldCom, Inc.
2800 River Road, Ste. 490
Des Plaines, IL 60018
(PH: 1-800-279-9080, Ext. 209, FAX: 847-318-9125)

Ms. Linda L. Oliver
Mr. David L. Sieradzki
Ms. Cindy D. Jackson
Hogan & Hartson, LLP
555 Thirteenth St., N.W.
Washington, D.C. 20004
(PH: 202-637-5600 / FAX: 202-637-5910)

Threshold to Refile

Ameritech must gather and submit to the Commission all of the following information with the filing of another statement.

Processing

1. Evidence demonstrating that all five interfaces, pre-ordering, ordering, provisioning, repair and maintenance, and billing are providing predictable and reliable results.

a. The demonstration can be in the form of a complete and representative sample of live transactions or test simulated transactions.

1. The formulation, execution, and review of test simulated transactions can not be carried out unilaterally by Ameritech. An independent third party may be engaged to review the testing or participation of industry parties may be used. The test must include sufficient volumes to simulate the volumes of transactions that could be expected to occur in production.

b. Evidence must be in the form of data collected on test or live transactions.

1. Complete and representative data available at the date of filing that can be used for trend analysis must be included for all of the following for each interface:

A. The processing results (complete, reject, delay),

B. The numbers of manual versus automatically processed transactions,

C. The reasons for rejection, or manual processing on both the Ameritech and CLEC sides of an interface, and

D. The occurrence of and clearing time for all service affecting troubles.

c. The demonstration must show predictable and reliable processing of transactions associated with standard offerings by the interfaces.

Parity

2. Evidence demonstrating the interfaces are processing transactions in substantially the same time and manner that Ameritech provides to itself for comparable transactions for all five interfaces.

a. Evidence must be in the form of complete and representative data.

Pre-ordering

1. A measure of CLEC response time for each of the pre-ordering functions, customer service records, telephone number, and due date.

A. A means of demonstrating the performance of pre-ordering functions occurs in a reasonable length of time.

2. A measure of Ameritech customer service representative response time for each of the pre-ordering functions, customer service records, telephone number and due date.

Ordering

3. A measure of CLEC due dates missed for each type of order. Examples include: with dispatch of a field technician and without dispatch of a field technician. Analysis

should be provided for active products and services. A request pending past its due date must be included as a missed due date.

A. A means of demonstrating the performance of provisioning of unbundled loops occurs in a reasonable length of time.

B. A means of demonstrating that all due dates are available to both Ameritech and CLEC representatives in a nondiscriminatory manner.

4. A measure of Ameritech due dates missed for each type of order.

Examples include: with dispatch of a field technician and without dispatch of a field technician. Analysis should be provided for active products and services. A request pending past its due date must be included as a missed due date.

Provisioning

5. A measure of CLEC response time for provisioning messages. Each type of provisioning messages should be included, order acknowledgment, order confirmation, order completion.

A. A means of demonstrating the performance of order acknowledgments and order confirmation is in a reasonable length of time.

6. A measure of Ameritech order completion information availability.

Repair and Maintenance

7. A measure of CLEC response intervals related to repair and maintenance. Intervals will include notice acknowledgment, and repair completion. Further detail may be provided including grouping by complexity of work.

A. A means of demonstrating the performance of acknowledgments are in a reasonable length of time.

B. A means of demonstrating the all repair scheduling and dispatching is available to both Ameritech and CLEC representatives in a nondiscriminatory manner.

8. A measure of Ameritech response interval for repair and maintenance completion in the same groupings as the CLEC comparisons.

Billing

9. A means of demonstrating CLEC billing accuracy to include the speed and accuracy of daily usage feed information and the accuracy of monthly CLEC bills.

A. A means of demonstrating that the rates charged to CLECs are consistent with filed tariffs or interconnection agreements.

10. A means of demonstrating Ameritech billing accuracy.

b. The data must demonstrate that the interfaces are processing transactions in substantially the same time and manner that Ameritech provides to itself for comparable transactions.

Specifications

3. Evidence that users have access to all specifications and documentation needed to use all five interfaces.

a. Evidence includes the manuals provided to competing providers to assist them to use each of the interfaces.

b. Evidence includes statements for each interface detailing what the current industry standards are and the extent and reason for any difference from industry standards.

c. Evidence includes documentation of the USOCs for ordering standard offerings of resale services and unbundled network elements, plus common combinations of unbundled network elements.

Change Management

4. The terms and conditions of the Change Management Process for each of the five interfaces.

a. The terms and conditions are to include at a minimum

1. The frequency of batched changes.

2. The circumstances under which changes more or less frequently than the batched changes will be allowed.

3. Description of the explanation that will be given for the need for each change, including if the change was requested by the industry or initiated by Ameritech.

4. A description of the process by which users of the interface will have meaningful input into the scheduling of batch updates.

5. A commitment that all updates will meet one of the two following criteria.

A. The upgraded interfaces are backwards compatible. That is that any software written to previous specifications will continue to operate as before, or

B. That none of the production users of the affected interface has filed an objection to the implementation schedule for the update. If an objection is filed, it may be appealed to the Commission, which may approve the original schedule, or set a revised schedule.

b. Adoption of the FCC rules, as contained in 47 CFR §§ 50.307 through 50.335, with the modifications required in the Findings of Fact, would meet minimum terms and conditions.

Correspondence

5. A file of all correspondence with CLECs concerning inquiries related to the use of the interfaces.

H:\dockets\cheklist\order2\threshold.doc